

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD,)	CASE NO. 2:25-CV-1843-MMB
)	
Plaintiff,)	JUDGE MICHAEL M. BAYLSON
)	
v.)	
)	
EXACT CARE PHARMACY, LLC,)	
)	
Defendant.)	
)	

**UNCONTESTED MOTION FOR A 30-DAY EXTENSION TO ANSWER, MOVE, OR
OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, Defendant Exact Care Pharmacy, LLC (“Defendant”) respectfully requests a thirty-day extension of time (i.e. until June 4, 2025) to answer, move, or otherwise plead to Plaintiff’s Complaint. Plaintiff Leon Weingrad (“Plaintiff”) does not oppose the requested 30-day extension.

This Motion is not intended for purposes of undue delay. Rather, the requested extension is intended to allow the Defendant additional time to investigate the claims asserted in Plaintiff’s Complaint and to evaluate Defendant’s defenses. Defendant has neither sought nor been granted a previous extension of time or leave to plead in this case. Accordingly, Defendant respectfully requests that Defendant be granted until June 4, 2025, to answer, move, or otherwise plead to Plaintiff’s Complaint.

Pursuant to Local Rules 7.1(a) and (b), a Certificate of Counsel and a proposed Order granting this Motion is filed herewith for the Court’s consideration.

Respectfully submitted,

/s/ Sean P. Fahey

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*Attorneys for Defendant
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CERTIFICATE OF COUNSEL

I hereby certify that counsel for Defendant Exact Care Pharmacy, LLC (“Defendant”) conferred with counsel for Plaintiff Leon Weingrad (“Plaintiff”) and Plaintiff does not oppose Defendant’s Motion for a 30-Day Extension to Answer, Move or Otherwise Plead to Plaintiff’s Complaint.

/s/ Sean P. Fahey
Sean P. Fahey

*Attorney for Defendant
Exact Care Pharmacy, LLC*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been filed electronically on May 1, 2025, with the United States District Court for the Eastern District of Pennsylvania. Notice of the filing will be sent by email to all counsel by operation of the Court's electronic filing system, and all parties may access this filing through that system.

/s/ Sean P. Fahey

Sean P. Fahey

*Attorney for Defendant
Exact Care Pharmacy, LLC*